



Shoptalk

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A newsletter about dangerous waste and pollution prevention
Volume 23, No. 1, December 2012 – Publication Number 13-04-001a

Announcements:

- **Online Tutorials in DW Management Revised** The updated tutorials on dangerous waste management are now available online. Ecology revised them to make them easier to understand and provide better illustrations.
- **Environmental Management Systems (EMS) Training Webinar** Ecology and its partners are hosting a series of webinars. The EMS Training page has information on upcoming sessions and sessions held in fall 2012.
- **Possible Disposal Option for Small Quantity Generators (SQGs)** Are you an SQG looking to get rid of your waste? Your county or city might take your waste. Check the Moderate Risk Web site and contact your local solid waste department to learn about options.
- **New Web Site Explains Toxic Chemical Threats to Puget Sound** A new Web site links what's known about toxic contamination in Puget Sound to ongoing efforts to keep contamination out of the Sound. The science comes from the Puget Sound Toxics Assessment report.

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These are violations that dangerous waste compliance inspectors find most often. They account for more than half of all the violations cited in the last 12 months. Follow these tips and your next inspection should be a breeze.

Department of Ecology

Your business is liable for all dangerous wastes you generate. If you are uncertain about your responsibilities as a dangerous waste generator, call your nearest Ecology office and ask for a hazardous waste specialist. For more information on reducing or recycling dangerous waste, ask for the toxics reduction staff at:

Bellevue: (425) 649-7000
Lacey: (360) 407-6300
Yakima: (509) 575-2490
Spokane: (509) 329-3400

To ask about available formats for the visually impaired please call the Hazardous Waste and Toxics Reduction Program at 360-407-6700. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

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Carpet cleaning, painting and pressure washing use water in their process and can generate hundreds of gallons of wastewater. The wrong disposal method can create problems and pollute our water and land.

The Top Ten Violations and How to Avoid Them

According to dangerous waste inspectors, the following common violations account for more than half of all the violations cited in the last 12 months. Follow these tips and your next inspection should be a breeze.

#1: No label for risk or dangerous/hazardous waste on containers

How to avoid: Make sure you mark each container with “Dangerous Waste” or “Hazardous Waste” and a label(s) for the primary risk(s), such as “Corrosive” or “Flammable.” And make sure the labels can be easily read.

#2: Not properly designating (identifying) the wastes

How to avoid: Identify what your waste is made of. You can try any of these:

- Find the waste in the lists shown in the dangerous waste regulations.
- Use Ecology’s online designation tool to help designate your waste.
- Have an accredited lab test a sample of the waste.
- Ask your Ecology compliance inspector for help.

It’s okay to work with your disposal company to determine what’s in your waste, and what codes apply, but that may not always be accurate. And if it’s wrong, you’re the one on the hook, not the disposal company.

#3: No accumulation start date on waste container

How to avoid: Mark your container with the date as soon as you start putting waste in it. There is a blank space on the downloadable label for the start date. If the container is in a satellite accumulation area, mark the date when it is full. (Be sure to move it to your final accumulation area within three [3] days.)

#4: Small quantity handler* of Universal Waste not labeling or marking waste containers

How to avoid: There are four types of Universal Waste:

- Batteries
- Mercury-Containing Equipment
- Mercury-Containing Thermostats
- Lamps

**A small quantity handler is someone who accumulates less than 11,000 pounds total of all types of Universal Waste, less than 2,200 pounds of lamps, or both.*



Do it like this. This drum is properly labeled with a Hazardous Waste label (yellow) and a "Flammable" risk label (red).

A yellow rectangular label with a black border. At the top, it says 'Hazardous Waste' in large red letters. Below that, in smaller black text, it says 'FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the Environmental Protection Agency.' The label contains several fields for information: 'Accumulation Start Date:' (circled in red), 'Responsible Quantities (RQ):' with a line for 'lbs', 'Manifest Document #:', 'Emergency Response Guide #:', 'EPA Waste Code(s) and/or Characteristic(s):', 'Generator Name:', 'Address:', 'City:', 'State:', 'Zip:', 'EPA ID #:', 'EPA/DOT Shipping Name:', 'Hazard Class:', 'UNNA #:', and 'Packing Group (PG):'. At the bottom, it says 'In the event of a spill or release of this hazardous waste, contact the US Coast Guard National Response Center at 1-800-424-8802 for information and assistance.'

Mark the date as soon as you start adding waste to the container.

Each container must be labeled with one of the following:

- "Universal Waste (type)", example - **Universal Waste Batteries**
- "Waste (type)", example - **Waste Batteries**
- "Used (type)", example - **Used Batteries**

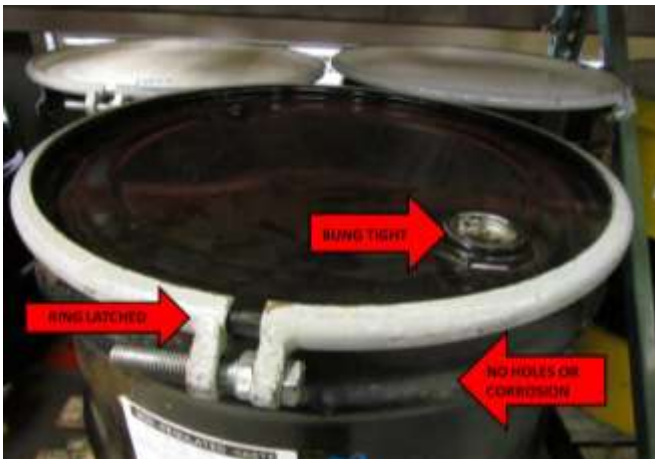
#5: Not properly closing waste containers

How to avoid: Containers must not spill if they tip over. Make sure your containers:

- Have a firmly attached lid.
- Do not have any holes.
- Have bungs screwed in and rings latched.



If you need to frequently add waste, get a locking funnel or a top that screws into the bung and keep it latched unless you are actively adding waste.



Drum that is closed correctly.



Example of a latching funnel.

#6: Small quantity handler of Universal Waste exceeding storage time limits

How to avoid: You can only keep Universal Waste for one year. Make sure you meet this time limit by writing on the label the date you place the first item in the container. Within one year, recycle the Universal Waste with a qualified dangerous waste recycler (i.e., a Universal Waste destination facility). And keep good records that show you are meeting the time limit.

#7: Not making weekly inspections of waste containers

How to avoid: Make it a habit to check your containers of dangerous waste each week. See that they are in good shape and not leaking. Keep a record of these inspections. Note any problems you find and how you fix them. Here's a handy checklist to use. (You aren't required to inspect the waste containers in your satellite accumulation area(s), but it's a good idea anyway.)

#8: Small quantity handler of Universal Waste Lamps not managing them properly

How to avoid: Store lamps indoors in cardboard or fiber containers that protect the lamps from breaking. Keep the containers closed.



Left: Sticking lamps in an open garbage can won't protect them from breaking, especially if someone opens that door. **Right:** The lamps in these containers are protected and labeled correctly.

#9: Not properly labeling containers and tanks of used oil

How to avoid: Mark all containers and tanks of used oil with "Used Oil." It doesn't have to be fancy. You can print your own sign and tape it to the container, write on the container with a marker, or stencil the words on with paint. The inspector just has to be able to easily read it.

#10: Leaving used oil containers open

How to avoid: See #5. Inspectors frequently find that workers have left oil filters and other used oil containers to drain into a drum for more than one work shift. Or they have drained the oil from a vehicle and then left the full drain pan to sit before emptying it into the collection drum. That's a spill waiting to happen. Take care of used oil promptly and keep your used oil containers closed when not in use.

Some steps you can take:

- Train your employees in these tips, and follow-up with an accountability or incentive program, or both. Experience shows that the success of training depends on following up with your employees.
- Make it easy for your workers to do the right thing. Put what they need as close to the work area as possible, such as labels (already completed if possible), lids, bung wrenches, and any other needed items.
- Post examples and reminders. Show properly completed labels and post signs, such as "Keep it closed," "Waste lamps here," etc.

Where to get labels

You can download the labels in this article for free here:
www.ecy.wa.gov/programs/hwtr/hw_labels/index.html

Treatment, storage, and disposal vendors may have labels available. You can also buy them online. Search for "hazardous waste labels" or "dangerous waste labels."



Risk Labels – What They Are and How to Use Them

Every container of dangerous waste must show three things:

1. The words "Dangerous Waste" or "Hazardous Waste,"
2. The date waste was first put in the container, (unless it is in a satellite accumulation area), and
3. A label or sign that identifies the major risk(s) associated with the waste.

That last requirement seems to be causing some confusion among shop owners and workers. It's what we call a "risk label." There's a new publication that can help you understand risk labels, [Risk Labels Required for Dangerous Waste Containers](#) (Pub. #12-04-016).

Risk labels are important because they show what type of nastiness the waste holds – whether it will catch fire, eat away skin, explode, or cause other problems. Those are what inspectors call characteristics, and the next person who handles that container needs to know about them.



Drum with proper labels "Hazardous Waste," accumulation start date marked, and "Flammable" risk label.



Note: Do not use the Class 9 Department of Transportation (DOT) risk label (example below) for on-site waste storage, it is not descriptive enough.



Preventing Pollution in 10,000 Visits

What does preventing pollution have to do with saving money? Quite a bit, according to the businesses in Washington that have done both. Guiding these businesses through the process of preventing pollution on their property is the job of 37 Local Source Control Specialists.

In January 2008, Ecology formed partnerships with 14 local health agencies and public utility districts. Now there are 25 partnerships, mostly in the northwest quarter of the state. The partnerships fund the specialists who visit small businesses to help them prevent pollution and add a little extra to the bottom line. The site visits are voluntary and free to the business.

The specialists have conducted more than 10,000 visits to businesses in Washington. By safely handling their hazardous material, businesses can make sure it doesn't end up in our air, water, and soil.

Small businesses typically have limited access to dangerous waste handling and disposal expertise. That's where the local specialists step in, helping businesses find ways to reduce the use of hazardous materials, reuse what they can, and properly dispose of dangerous waste. In some cases a business can rework their processes to eliminate a contaminant altogether.

"It's widely recognized that the state's economy depends on economically strong small businesses and that small businesses depend on a clean, pollution-free environment to be successful," said K Seiler, who manages Ecology's Hazardous Waste and Toxics Reduction Program. "Our assistance often saves them time and money, which are scarce resources for small businesses."

This one-to-one approach is expected to improve both our state's urban water quality and each business's bottom line. By reducing their use of toxic chemicals and thereby producing less dangerous waste, businesses can avoid the related disposal and cleanup costs.

Here are some examples of the work local source control specialists do:

- Specialists gave technical support to six dental offices and two veterinary hospitals in Kitsap County. Afterwards, the dentists and veterinarians adopted practices to properly dispose of dangerous waste, such as spent x-ray fixer, lead foil packets, and dental amalgam. One dental office installed an amalgam separator to eliminate discharges of mercury-containing waste to the sanitary sewer system. The veterinary hospitals converted to digital imaging, which removed silver and lead from their x-ray wastes.
- A marine business in Kitsap County had unlabeled drums of chemicals stored outside and didn't have tools on hand in case something spilled. A local source control specialist advised and helped the business move the drums inside, label them correctly, and develop a plan for cleaning up any future spills. The business was rewarded with a free, pre-packaged spill kit.



Local Source Control Specialists from city and county agencies visit small businesses to help them prevent pollution from dangerous waste.

- An auto-scraping business in the Duwamish industrial area in Seattle saved money and protected Puget Sound by moving auto parts, batteries and other materials under cover. Left out in the rain, those items could collect water and possibly produce contaminated runoff. A local source control specialist showed the business that many of the items were valuable and could be recycled instead of stockpiled.

"These businesses are to be congratulated for working with us to do their part to prevent pollution," said Seiler. "All of them worked hard and did what it took to be part of the solution instead of part of the problem."

WasteLine Q&A: Disposing of Spent Shop Rags

It seems like many shop workers are wondering what to do with spent rags or wipes. Here are answers to the most frequent questions. They are based on [Chapter 173-303 WAC, the Dangerous Waste Regulations](#).

Question: *"Are my rags a dangerous waste? My waste vendor says to look at the bottom of my container of waste rags (wipes) and if there are no liquids the waste rags are not dangerous waste. Is this correct?"*

Answer: No. You are not getting good advice from that waste vendor. The advice could lead to unsafe handling and disposal of dangerous waste, and possible penalties. "Dry" spent rags may [designate](#) for one or more of the following:

- Ignitability (waste code [D001](#))
- Heavy metals (such as: [D008](#), [D006](#))
- Organics (such as: [D039](#))
- State toxicity ([WT02](#))
- Because they are listed dangerous waste ([F001 – F005](#))



Shop workers use rags for a wide variety of applications. Generators must properly evaluate spent rags before disposing of them.

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Question: *"What is considered a "dry" rag for the purposes of the ignitability characteristic designation (D001)?"*

Answer: If a spent rag passes the paint filter test ([Method 9095](#) in [SW-846](#), the United States Environmental Protection Agency's (EPA's) hazardous waste test methods), the rag is a solid rather than a liquid material.

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Question: *"If a spent rag passes the paint filter test can it still designate as ignitable dangerous waste (D001)?"*

Answer: Yes. In this case you must use the narrative criteria for ignitability found in [WAC 173-303-090\(5\)\(a\)\(ii\)](#).

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Question: *"My rags are dripping wet. Can I dry my spent rags on drying racks before I containerize them for disposal?"*

Answer: No. This is an unpermitted discharge of waste into the environment (air). And it could be considered a form of dangerous waste treatment without a permit.

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Question: *"In respect to the D001 designation only, if liquids have accumulated at the bottom of my container of waste rags what are my designation options?"*

Answer: There are two approaches to this:

- **Approach one:** If the liquid phase designates as ignitable under [WAC 173-303-090\(5\)\(a\)\(i\)](#) and is **not** separated out from the rags it derived from, the entire waste stream is D001.
- **Approach two:** If the liquid phase designates as ignitable under [WAC 173-303-090\(5\)\(a\)\(i\)](#) and is separated out from the rags it derived from, then you need to evaluate two waste streams. You already know the liquid designates as ignitable. So now you need to evaluate the solid phase/material (the rags) for any free liquid phase (i.e., the paint filter test). If there is no free liquid phase, then you must evaluate the rags for ignitability under section [-090\(5\)\(a\)\(ii\)](#).

Remember, in either approach, you must fully and properly evaluate the waste generated against the dangerous waste listings, characteristics, and criteria.

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If you have questions about safely handling your dangerous waste, contact a dangerous waste specialist at your nearest [Ecology regional office](#).

Annual Reports Due March 1, 2013

If your site had an active [RCRA Site ID Number](#) in 2012, you need to submit a 2012 Dangerous Waste Annual Report to the Department of Ecology by March 1, 2013. Ecology will mail a reminder notice at the end of December to all reporters for sites with active RCRA¹ Site ID Numbers. Electronic reporters will receive e-mails as well.

To get started on your Annual Report, go to the [TurboWaste.net](#) site and click on the orange "Enter TurboWaste" button.

For more information and help with your report, go to the [Dangerous Waste Annual Report Web site](#). If you have questions about your 2012 generator status, or RCRA Site ID Number, please call your [local Ecology office](#) and ask to talk to a dangerous waste specialist. If you have questions about the management or recycling of your waste after you shipped it, please call your waste contractor.



¹ Resource Conservation and Recovery Act

Tier Two Reports Due March 1, 2013

The New Year is coming soon, and many businesses are once again facing a variety of reports and deadlines in the approaching months.

If your facility stores hazardous substances, it's time to review inventory records to see if you meet the reporting requirements for Tier Two – Emergency & Hazardous Chemical Inventory Reporting.



Tier Two information helps emergency responders know what chemicals might pose a risk during an emergency.

Is your facility required to report?

You must report if you had on site 10,000 pounds or more of a chemical or hazardous substance, such as gasoline or diesel. The [Emergency Planning and Community Right to Know Act](#) (EPCRA) defines hazardous substances as chemicals present in the workplace that are capable of causing harm. Any product that requires a Material Safety Data Sheet is potentially reportable. Chemicals classified as Extremely Hazardous Substances (EHS), such as ammonia and chlorine, are reportable at much lower thresholds – ammonia at 500 and chlorine at 100 pounds. These requirements apply to the maximum amount of a chemical or product **on site at any one time** during the previous calendar year.

Who needs the report and why?

The federal government created EPCRA, also known as SARA Title III. The Washington State Emergency Response Commission adopted the same reporting requirements. EPCRA Section 312 requires a facility storing hazardous substances to submit a Tier Two report each year to the State Emergency Response Commission (SERC), the Local Emergency Planning Committee, and the local fire department.

The Commission and local agencies use this information for pre-disaster planning and local emergency response purposes. EPCRA is an integral part of successful disaster prevention, preparedness, and response. The Department of Ecology manages EPCRA reports on behalf of the SERC.

How to report

The quickest and most efficient way to report is to submit via [Tier Two Online](#). This online reporting application allows you to:

- Easily upload previously submitted data.
- Quickly update your information.
- Submit directly to the SERC.
- Print completed forms to send to your local agencies and for your records.

Visit the [EPCRA Web site](#):

- To determine if your company needs to report by March 1, 2013.
- To register for Tier Two Online.
- For addresses to send your report to.
- For more information on other EPCRA reporting requirements.

For EPCRA training, contact your Local Emergency Planning Committee. Ecology's Community Right-to-Know specialists can provide regulatory assistance and technical support. Contact us at epcra@ecy.wa.gov or call (800) 633- 7585. Press "2" at the greeting to reach a Community Right-to-Know Specialist.



Carpet cleaning, painting and pressure washing – what do these things have in common? Water. All these activities use water in their process and can generate hundreds of gallons of wastewater. The wrong disposal method can create problems pollute our water and land.

If someone dumps wastewater into a storm drain, it will flow, most likely untreated, to the nearest water body. This water carries pollutants, such as soaps and dirt from carpet cleaning, residual paint waste, and solvents from painting and oil and grease from pressure washing, which can harm our environment.

Fortunately, there's a way to do it right.

The [Washington Stormwater Center](#) is working with municipalities throughout the state to spread the word on proper disposal of wastewater.

The campaign is called [Dump Smart](#). It has tips specifically for carpet cleaners, painters, and pressure washers, but anyone can gain a better understanding of proper wastewater disposal from this program. Here are some basics:

- “Only Rain Down the Drain” – Never dump anything down a storm drain, into a drainage ditch, into the street, or other drainage pathway.
- Use a sanitary sewer connection to dispose of wastewater that is not hazardous.
- Pre-clean with dry methods before you begin pressure washing: soak up any oil or grease with absorbent and sweep up, or use an oil absorbent pad. [Small quantity generators](#) can dispose of this in the trash.
- Sweep up any large debris and leaves before washing.
- When in doubt, call the city or county where the jobsite is to learn about their requirements.

For more information on the Dump Smart program or for general stormwater questions, call the Washington Stormwater Center at 1-855-WASTORM or visit our Web site at www.wastormwatercenter.org.



Only rain down the drain. Keep it clean, for all of us.

Links to Resources Mentioned in this Issue

Announcements

- **Information Help for DW Generators:** www.ecy.wa.gov/programs/hwtr/workshops/index.html
- **EMS Training Webinar:** www.ecy.wa.gov/programs/hwtr/P2/EMSTraining.html
- **Moderate Risk Waste Web site:** www.ecy.wa.gov/programs/swfa/mrw/mrw_contacts.html
- **Controlling Toxic Chemicals in Puget Sound:** www.ecy.wa.gov/puget_sound/toxicchemicals/index.html

The Top Ten Violations and How to Avoid Them

- **Free Hazardous Waste Labels:** www.ecy.wa.gov/programs/hwtr/hw_labels/index.html
- **Waste Designation:** www.ecy.wa.gov/programs/hwtr/manage_waste/identify_waste.html
- **Dangerous Waste Regulations:** www.ecy.wa.gov/programs/hwtr/reg_comp_guide/173-303.HTM
- **Online Designation Tool:** www.ecy.wa.gov/programs/hwtr/manage_waste/des_intro.html
- **Universal Waste:** www.ecy.wa.gov/programs/hwtr/manage_waste/universal_waste.html
- **Weekly Inspection Checklist:** <https://fortress.wa.gov/ecy/publications/SummaryPages/1204019.html>

Risk Labels – What They Are and How to Use Them

- ***Risk Labels Required for Dangerous Waste Containers, Ecology publication #12-04-016:***
<https://fortress.wa.gov/ecy/publications/SummaryPages/1204016.html>

Preventing Pollution in 10,000 Visits

- **Local Source Control Partnership:** www.ecy.wa.gov/programs/hwtr/lsp/index.html
- **More about Local Source Control:** www.ecy.wa.gov/programs/hwtr/lsp/aboutsc.html
- **Economy and the Environment:** www.ecy.wa.gov/economy.html

WasteLine Q&A: Disposing of Spent Shop Rags

- **Chapter 173-303 WAC:** www.ecy.wa.gov/programs/hwtr/reg_comp_guide/173-303.htm
- **Designation:** www.ecy.wa.gov/programs/hwtr/manage_waste/identify_waste.html
- **Waste Codes D001, D008, D006, D039:** <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-090>
- **State Toxicity Waste Code WT02:** <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-100>
- **Listed Dangerous Wastes F001-F005:** <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-9904>
- **Paint filter test Method 9095:** www.epa.gov/epawaste/hazard/testmethods/sw846/pdfs/9095b.pdf
- **EPA's Test Methods SW-846:** www.epa.gov/epawaste/hazard/testmethods/sw846/index.htm
- **WAC 173-303-090(5)(a)(i), (ii):** <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-090>
- **Ecology Regional Offices:** www.ecy.wa.gov/org.html

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- **RCRA Site ID Number:** www.ecy.wa.gov/programs/hwtr/waste-report/notification.html
- **TurboWaste.net:** <https://fortress.wa.gov/ecy/turbowaste/Login/Splash.aspx>
- **DW Annual Report Web site:** www.ecy.wa.gov/programs/hwtr/waste-report/index.html

Tier Two Reports Due March 1, 2013

- **Emergency Planning and Community Right-to-Know Act:** www.ecy.wa.gov/epcra/whatis.html
- **Tier Two Online:** www.ecy.wa.gov/epcra/tiertwo.html
- **EPCRA Web site:** www.ecy.wa.gov/epcra/
- **EPCRA Email:** EPCRA@ecy.wa.gov

Dump Smart – It's Not Just Water

- **Washington Stormwater Center:** www.wastormwatercenter.org/
- **Dump Smart Campaign:** www.wastormwatercenter.org/dump-smart
- **Rules for Small Quantity Generators:** www.ecy.wa.gov/programs/hwtr/manage_waste/rules_for_sqgs.html